



October 1, 2008

The Honorable George Hawkins
Director
District of Columbia Department of the Environment
51 N Street NE, 6th Floor
Washington, DC 20002

VIA OVERNIGHT

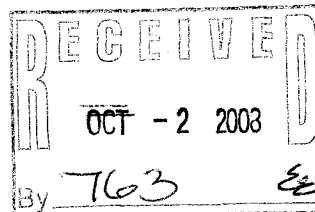
Dear Director Hawkins:

I am writing in response to your information request to Chevron dated September 5, 2008 and transmitted by electronic mail to our outside counsel.

As a preliminary matter, the letter was addressed to Denise Dixon of Chevron and indicates certified mail delivery. To this day, we have no record of a certified copy having been delivered. If your office has such a record, it would be useful for us to identify where the document was mishandled so that we can ensure that we are as responsive as possible to your correspondence.

The letter asks a series of questions concerning the use of Perchloroethylene (PERC) at the former Chevron facility number 122208, and relies on the requirements of Title 20 of the District of Columbia Municipal Regulations (DCMR) § 4303.3. We note first that to the extent these regulations apply, Chevron was not properly served under 20 DCMR 4303.3. More substantively, the Director's authority under these provisions extends to "a generator, transporter, owner, or operator of a regulated facility, or any other person handling hazardous waste, used oil, or regulated medical waste . . . *as may be necessary to determine compliance with the laws and rules listed in § 4300.*" 20 DCMR § 4302.3 (emphasis supplied). Chevron has no compliance obligations under "the laws and rules listed under § 4300," and so the authority invoked is not relevant to Chevron. If the District's view is to the contrary, we would be interested to understand the basis.

We nonetheless would like to be as responsive as possible to your request, consistent with Chevron's continuing effort to work cooperatively with the District. As noted in the record, the United States Environmental Protection (USEPA) had presented a nearly identical set of questions to Chevron in an earlier phase of the site investigation. Enclosed are the EPA's information request and our response. Chevron considers this information to be fully responsive to your information request. If you disagree, please let me know.



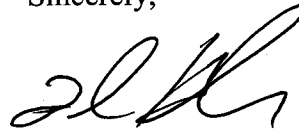
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As indicated in the response and the larger body of data concerning the Chillum facility, there are no data to suggest that any PERC contamination in the area is attributable to Chevron. Indeed, extensive soil and groundwater sampling was conducted at the Chillum facility at the close of Chevron's period of ownership in 1989. This testing, using USEPA Test Method 8240, detected no chlorinated compounds at the facility in soil or groundwater at the facility site, which conclusively excludes the possibility that PERC detected elsewhere is somehow linked to the facility during Chevron's period of ownership. In addition, Chevron has been advised informally by USEPA in the past that the two dry-cleaners in the immediate area – House of Kleen and Hope Cleaners – are the likely source of the contamination.

We recognize that PERC contamination, which has become ubiquitous in the area, now appears to be increasing in concentration in Area B and in surrounding areas close to the groundwater pump-and-treat system. The 1989 data makes clear that this phenomenon is attributable to sources other than the former Chevron facility, and perhaps to a process in which the pump-and-treat system is drawing and concentrating PERC in this area. For your convenience, we have mapped data from a number of sources already in the record to demonstrate our current understanding of where PERC currently occurs in groundwater.

We hope this information is useful to you, and look forward to understanding how Chevron can resolve any outstanding concerns you may have.

Sincerely,



Tearle W.T. Harlan

cc w/out enclosures:

Denise Dixon, CEMC
Judson Polikoff, CEMC
Brad Campbell, Esquire